



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2011 MAR 16 P 4: 23
COMMISSION
SECRETARIAT

SENSITIVE

MEMORANDUM

TO: The Commission

FROM: Christopher Hughey
Acting General Counsel

Kathleen M. Guith
Acting Associate General Counsel for Enforcement

BY: Susan L. Lebeaux *SL*
Acting Deputy Associate General Counsel for Enforcement

Christine C. Gallagher *CG*
Attorney

SUBJECT: MUR 6454 (Evan H. Snapper) Pre-Probable Cause Conciliation

Attached is a proposed conciliation agreement signed by Evan H. Snapper ("Respondent"). The conciliation agreement settles knowing and willful violations of 2 U.S.C. § 441f by the Respondent for reimbursing his own and other individuals' contributions to federal candidates during the 2007-2008 election cycle. Mr. Snapper, a former principal at Anchin, Block & Anchin, LLP, reimbursed his and his wife's contributions in the amount of \$13,800 to the Gilmore Presidential and Senate Committees and his and various individuals' contributions in the amount of \$48,300 to the Hillary Clinton for President Campaign with the funds of his client's accounts at Anchin, Block & Anchin, LLP, an accounting and business management firm.

Attachment 1.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45

In sum, we believe the negotiated agreement represents a reasonable compromise under the circumstances. Therefore, we recommend that the Commission accept the attached conciliation agreement signed by Mr. Snapper and close the file as to this Respondent.

RECOMMENDATIONS:

1. Accept the attached conciliation agreement with Evan H. Snapper;
2. Approve the appropriate letter;
3. Close the file as to Evan H. Snapper.